REMARKS

Claims 1-39 are all the claim pending in the application.

Claims 1, 2, 4, 13, 14, 16, 25, 26, 28, and 37-39 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by the Challenger et al. publication *Distributed Cache Manager and API* (hereinafter "Challenger").

To anticipate a claim under 35 U.S.C. § 102, Challenger must teach every element and recitation of the Applicant's claims. Further, Challenger must teach each element of the claims in as complete detail as set forth in the claims, *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Rejections under 35 U.S.C. § 102 are proper only when the claimed subject matter is identically disclosed or described in the prior art. Thus, the reference must clearly and unequivocally disclose every element and recitation of the claimed invention. It is respectfully submitted that Challenger does not anticipate the claims for at least the following reasons. Claim 1, for example, is directed to a method for managing data stored in a data storage device. The claim requires "*automatically managing the cached web page and the referenced objects to ensure the display of a complete web page.*" It is respectfully submitted that Challenger does not disclose or even suggest this limitation.

Regarding this claim limitation, the Examiner alleges that Challenger teaches "monitoring (managing) the referenced tables (objects) for updates and invalidating (managing) cached web pages accordingly" (page 9 of the Office Action). However, Challenger only discloses a routine that performs updates to a database and that also can update the cache without knowing the specific URLs which are affected by the updates (Challenger's *Overview* section, ¶

3). Applicant respectfully points out that to anticipate a claim, the reference must teach each element of the claim in as complete detail as set forth in the claim.

The Examiner takes the position that Challenger's disclosure of an API function for specifying that a data table has been updated corresponds to managing the database table: However, such a position is contrary to Challenger which discloses "managing cached, dynamically generated HTML pages for WWW sites," where such pages are invalidated, but discloses no such management of data base tables. Accordingly, it is respectfully submitted that Challenger does not teach or suggest automatically managing objects referenced by a web page to ensure the display of a complete web page, as required by claim 1.

Further, nowhere does Challenger disclose automatically managing the data base tables which the Examiner asserts corresponds to the claimed referenced objects. Rather, Challenger merely mentions that some routine is executed to update the database and that invalidates the cache. Challenger gives no indication that the database tables are automatically managed. Moreover, Challenger does not disclose and cannot possibly suggest automatically managing the cached web page and the referenced objects to ensure the display of a complete web page as recited in claim 1, since Challenger does not automatically manage any referenced objects nor are updates performed to display a complete web page. Instead, Challenger's web page is merely purged from cache if the database is updated. In other words, while Challenger deals with displaying an updated web page, it does not address the problem of displaying an incomplete web page as required by the claims. Accordingly, Challenger does not anticipate the claims for these reasons, as well.

For at least these exemplary reasons, Applicant respectfully submits that independent claim 1 is patentably distinguishable from Challenger. Applicant therefore respectfully requests the Examiner to reconsider and withdraw this rejection of independent claim 1. With respect to independent claims 13 and 25, Applicant respectfully submits that they recite features similar to the features discussed above with respect to claim 1, and hence are patentable for at least the same reasons. Consequently, claims 2, 4, 14, 16, 26, 28 and 37-39 are not anticipated by Challenger, at least by virtue of their dependency from the independent claims discussed above.

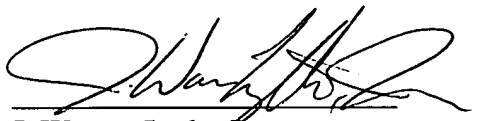
The exemplary deficiencies of Challenger, as set forth above, are not cured by Mattis et al., U.S. Patent No. 6,209,903 (hereinafter "Mattis"); Burns et al., U.S. Patent No. 5,991,306 (hereinafter "Burns"); Schultz et al., U.S. Patent No. 6,453,339 (hereinafter "Schultz"); Acharya et al., U.S. Patent No. 6,408,296 (hereinafter "Acharya"); and Scarr et al., U.S. Patent No. 5,659,547 (hereinafter "Scarr"), either alone or in combination. Consequently, claims 3, 5-12, 15, 17-24, 27 and 29-36 are patentable over the applied references, at least by virtue of their dependency from the independent claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Request for Reconsideration Under 37 C.F.R. § 1.116
Attorney Docket No.: ST-99-080 (A8492)
U.S. Application No.: 09/602,412

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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